

1 AARON D. FORD
Attorney General
2 Jessica Perlick (Bar. No. 13218)
Senior Deputy Attorney General
3 State of Nevada
Office of the Attorney General
4 555 E. Washington Ave., #3900
Las Vegas, NV 89101
5 (702) 486-3825 (phone)
(702) 486-2377 (fax)
6 JPerlick@ag.nv.gov

7 *Attorneys for Respondents*

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 LUIS GONZALAS,

11 Petitioner,

12 vs.

13 BRIAN WILLIAMS, et al.,

14 Respondents.
15 _____

Case No. 2:17-cv-01653-RFB-GWF

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
REPLY IN SUPPORT OF MOTION TO
DISMISS FIRST AMENDED PETITION
(ECF NO. 18)**

(FIRST REQUEST)

16
17 Respondents hereby move for a brief enlargement of time of five days from the current due date
18 of April 25, 2019, up to and including April 30, 2019, in which to file their reply in support of the motion
19 to dismiss Luis Gonzalas' First Amended Petition for Writ of Habeas Corpus (ECF No. 18). Respondents
20 make this motion pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and based
21 upon the attached declaration of counsel. This is the first enlargement of time sought by Respondents to
22 file the reply, and the request is brought in good faith and not for the purpose of delay.

23 DATED: April 25, 2019

24 AARON D. FORD
Attorney General

25 By: /s/ Jessica Perlick
26 Jessica Perlick (Bar. No. 13218)
27 Senior Deputy Attorney General
28

1 **DECLARATION OF JESSICA PERLICK**

2 STATE OF NEVADA)
3) ss:
4 COUNTY OF CLARK)

5 I, JESSICA PERLICK, being first duly sworn under oath, depose and state as follows:

6 1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am
7 employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to
8 represent Respondents in *Luis Gonzalas v. Brian Williams, et al.*, Case No. 2:17-cv-01653-RFB-GWF,
9 and as such, have personal knowledge of the matters contained herein.

10 2. This Motion is made in good faith and not for the purpose of delay.

11 3. The reply in support of Respondents' motion to dismiss is currently due on April 25, 2019.

12 4. I have been diligently working to complete the reply in the instant matter, but have
13 unfortunately been unable to do so. When Gonzalas filed the opposition in this matter, I was finishing a
14 reply in *Kinder v. Legrand*, 3:16-cv-00449, which was due yesterday, April 24, 2019. In addition to that
15 reply, I am also completing a 9th Circuit answering brief in *Mayo v. State of Nevada*, 18-16081 for May
16 2, 2019; and due to an internal personnel transfer, reviewing a new matter, *Cardenas-Ornelas v. Baker*,
17 3:17-cv-00461, which has a response deadline of May 6, 2019. I have also been training new deputies,
18 which requires me to review and edit their pleading drafts prior to filing. As a result, I have not been able
19 to finish the reply in this matter.

20 5. I have communicated with counsel for the Petitioner, and she does not oppose this request
21 for an extension.

22 6. Based on the foregoing, I respectfully request a brief enlargement of time of five days, up
23 to and including April 30, 2019, to file the reply.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed on this Thursday, April 25, 2019.

26 IT IS SO ORDERED:

27 /s/ Jessica Perlick
28 Jessica Perlick (Bar No. 13218)
Senior Deputy Attorney General

29 
30 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 29th day of April, 2019.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing *Unopposed Motion for Enlargement of Time to File Response to First Amended Petition for Writ of Habeas Corpus (ECF No. 18) (First Request)* with the Clerk of the Court by using the CM/ECF system on April 25, 2019.

The following participants in this case are registered CM/ECF users and will be served by the CM/ECF system:

C.B. Kirschner
Assistant Federal Public Defender
411 E. Bonneville Avenue, Suite 250
Las Vegas, Nevada 89101
Cb_Kirschner@fd.org

/s/ K. Plett
An employee of the Office of the Attorney General